

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

Daniel E. Hall, Plaintiff,
v.
Twitter Inc., Defendant.

Case No. 1:20-cv-536-SE

**PLAINTIFF'S MOTION FOR LEAVE TO REPLY TO TWITTER, INC.'S
OBJECTION TO PLAINTIFF'S MOTION FOR DEFAULT**

Plaintiff, pursuant to Local Rule 7.1(e)(2), moves, for leave to file a reply to Defendant's "Objection" [Doc. 107] to the Plaintiff's [Doc. 101] Motion for Default.

1. Plaintiff seeks leave to file a reply to rebut Twitter's outright misrepresentations describing the facts and arguments of Plaintiff's Motion within its Objection.

2. Plaintiff's [Doc. 101] Motion for Default is predicated upon the Court first Striking Twitter's [Doc. 3] Motion to Dismiss and [Doc. 3.1] MOL as they are scandalous and non-conforming to the rules.

3. In its Objection, Twitter unabashedly misrepresents to the Court that Plaintiff's "First, Second, and Third Requests" take issue with the Court's allegedly "unwritten, illegal pro hac vice" policies, when in fact, these requests were made on 6/8/2020, 7/22/2020 and 8/11/2020 and the Plaintiff was unaware of Judge

Johnstone's illegal policies until December 2020, and first brought it to the Courts attention on March 18, 2021.

3. Twitter then misrepresents to the Court that Plaintiff's [Doc. 46] "Motion for Entry of Default By Clerk," requested the same relief on the same grounds when in fact, Plaintiff added the additional facts that Twitter was notified of the illegality and inadequacy of its [Doc. 3] Motion to Dismiss, and to date (months later) has still made no attempt to provide to the Court or the Plaintiff a sufficient answer under Fed. R. Civ. P. 4. See [Doc. 46, pge 1].

2. Plaintiff does not file a memorandum of law herewith as all authority in support of its objection is cited herein.

Wherefore, Plaintiff respectfully requests that the Court allow Plaintiff to reply to Twitters objections.

Respectfully,

/s/ Daniel E. Hall
Plaintiff, aka, Sensa Verogna
SensaVerogna@gmail.com

CERTIFICATE OF SERVICE

I, Daniel E. Hall, certify that on this date I electronically filed the foregoing document using the CM/ECF system, which sent notification of such filing to the Defendants counsel of record, Jonathan M. Eck and Julie E. Schwartz, Esq., and Indraneel Sur, Lead Attorney for U.S. DOJ.

/s/Daniel E. Hall